

Plan of Correction

Program Name: First Step Counseling, Inc.	Date Submitted: 08/07/17	Date Due: 09/07/17
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Administrative POC-1

Rule #: 67:61:04:01	Rule Statement: Policies and procedures manual. Each agency shall have a policy and procedure manual to establish compliance with this article, and procedures for reviewing and updating the manual.	
Area of Noncompliance: The agency's policies and procedures reference the old ARSD 46:05. The current Rules went into effect in December 2016.		
Corrective Action (policy/procedure, training, environmental changes, etc): Completely update entire manual to meet current Rules		Anticipated Date Achieved/Implemented: Date Jan 1st 2018
Supporting Evidence:		Person Responsible: Kristina Hornback
How Maintained:		Board Notified: Y <input checked="" type="checkbox"/> N <input type="checkbox"/> n/a <input type="checkbox"/>

Administrative POC-2

Rule #: 67:61:02:21	Rule Statement: Sentinel event notification. Each accredited agency shall make a report to the division within 24 hours of any sentinel event including; death not primarily related to the natural course of the client's illness or underlying condition, permanent harm, or severe temporary harm, and intervention required to sustain life. The agency shall submit a follow-up report to the division within 72 hours of any sentinel event and the report shall include: <ol style="list-style-type: none"> 1) A written description of the event; 2) The client's name and date of birth; and 3) Immediate actions taken by the agency. Each agency shall develop root cause analysis policies and procedures to utilize in response to sentinel events. Each agency shall also report to the division as soon as possible: any fire with structural damage or where injury or death occurs, any partial or complete evacuation of the facility resulting from natural disaster, or any loss of utilities, such as electricity, natural gas, telephone, emergency generator, fire alarm, sprinklers, and other critical equipment necessary for operation of the facility for more than 24 hours.	
Area of Noncompliance: This was not found within the agency's policies and procedures.		
Corrective Action (policy/procedure, training, environmental changes, etc): Add Rule Statement into updated manual		Anticipated Date Achieved/Implemented: Date Jan 1st 2018

Supporting Evidence: [REDACTED]	Person Responsible: Kristina Thoenback
How Maintained: It's actually completed will submit with all corrections	Board Notified: Y <input checked="" type="checkbox"/> N <input type="checkbox"/> n/a <input type="checkbox"/>

Administrative POC-3

Rule #: 67:61:06:02	Rule Statement: 67:61:06:02. Guaranteed rights. A client has rights guaranteed under the constitution and laws of the United States and the state of South Dakota including: <ol style="list-style-type: none"> 1) The right to refuse extraordinary treatment as provided in SDCL 27A-12-3.22; 2) The right to be free of any exploitation or abuse; 3) The right to seek and have access to legal counsel; 4) To have access to an advocate as defined in subdivision 67:61:01:01(4) or an employee of the state's designated protection and advocacy system; 5) The right to confidentiality of all records, correspondence, and information relating to assessment, diagnosis, and treatment in accordance with the confidentiality of records requirements of the Substance Abuse and Mental Health Services Administration, 42 U.S.C. §§ 290 dd-2 (January 7, 2011), the confidentiality of alcohol and drug abuse patient records, 42 C.F.R. Part 2 (June 9, 1987), and the security and privacy of HIPAA, 45 C.F.R. Part 160 and 164 (September 26, 2016); and 6) The right to participate in decision making related to treatment, to the greatest extent possible.
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Area of Noncompliance: The client's rights need to be updated to include all elements of the rule.

Corrective Action (policy/procedure, training, environmental changes, etc): Update Reel as updating manual	Anticipated Date Achieved/Implemented: Date Jan 1st 2018
Supporting Evidence: [REDACTED]	Person Responsible: Kristina Thoenback
How Maintained: [REDACTED]	Board Notified: Y <input checked="" type="checkbox"/> N <input type="checkbox"/> n/a <input type="checkbox"/>

Administrative POC-4

Rule #: 67:61:07:04	Rule Statement: Closure and storage of case records. The agency shall have written policies and procedures to ensure the closure and storage of case records at the completion or termination of a treatment program including: <ol style="list-style-type: none"> 1) The identification of staff positions or titles responsible for the closure of case records within the agency and the MIS; 2) Procedures for the closure of inactive client records, that are clients who have not received services from an inpatient or residential program in three days or clients who have not received services from an outpatient program in 30 days; and 3) Procedures for the safe storage of client case records for at least six years from closure.
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Area of Noncompliance: The policies and procedures manual did not reflect the current timelines in accordance with rule.	
Corrective Action (policy/procedure, training, environmental changes, etc): update rules as updating manual	Anticipated Date Achieved/Implemented: Date Jan 1 st 2018
Supporting Evidence:	Person Responsible: Krishna Hornbaek
How Maintained:	Board Notified: Y <input checked="" type="checkbox"/> N <input type="checkbox"/> n/a <input type="checkbox"/>

Program Director Signature: 	Date: 8-31-17
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Send Plan of Correction to:

Accreditation Program
Department of Social Services
Division of Behavioral Health
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Sioux Falls, SD 57103
DSSBHAccred@state.sd.us

Brenda Grimm is also working on updating the integrated assessments per recommendations. We plan to submit this with updated manual as soon as possible. I gave us until January 1st, 2018 bc I only have a few hours a week to dedicate to the changes.

Thanks!
Krishna Hornbaek